



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
NEW YORK REGIONAL OFFICE
BROOKFIELD PLACE, 200 VESEY STREET, ROOM 400
NEW YORK, NEW YORK 10281-1022

December 5, 2016

VIA ECF

The Honorable Carol Bagley Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

The Honorable Steven L. Tiscione
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: SEC v. Premier Links, Inc. et al., 14-CV-7375 (CBA) (RLM)

Dear Judges Amon/Tiscione:

This letter responds to the Court's December 2, 2016 Order requesting information from the parties as to why fully briefed papers were not submitted. As described below, none of the defaulting Defendants and Relief Defendants opposed the SEC's motion. As such, the SEC's default motion is fully briefed and unopposed and the SEC respectfully requests that the Court issue judgments for the requested relief against the defaulting Defendants and Relief Defendants.

Specifically, on June 15, 2016, the SEC filed a default motion against the Defendants and certain of the Relief Defendants in the above-referenced matter. Each of these defaulting Defendants and Relief Defendants were served with copies of the SEC's motion papers as described in my attached declaration. It took a significant amount of time to serve certain of the Defendants and Relief Defendants (who were attempting to evade service) and service was not completed on those individuals until the end of August. Pursuant to Magistrate Judge Tiscione's May 21, 2016 scheduling order, the defaulting Defendants and Relief Defendants were given three months to oppose the motion. The SEC, therefore, was waiting until three months had passed from the completion of service (which occurred last week) before informing the Court that none of the defaulting Defendants and Relief Defendants had responded to the motion and that, therefore, the motion should be considered fully briefed.

With respect to Relief Defendant Darnell Jackson, against who the SEC intends on moving for summary judgment, the SEC is awaiting a declaration and as soon as it receives that declaration, it will file its motion papers. Mr. Jackson has asserted his Fifth Amendment Privilege against self-incrimination and, as such, the SEC anticipates that the motion will be unopposed.

I can be reached at (212) 336-0080 if the Court has any questions.

Respectfully submitted,

/S/ Todd D. Brody
Todd D. Brody
Senior Trial Counsel

Encl.